

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re	X	
	:	Chapter 11
BLAKE OF CHICAGO CORP., <i>et al.</i> ,	:	Case No. 04-12002 (CGC)
	:	
Debtors.	:	Jointly Administered
A.B. DICK COMPANY and	X	
PARAGON CORPORATE HOLDINGS, INC.,	:	
	:	Case No. 1:05-CV-00116-KAJ
Plaintiffs,	:	
	:	
v.	:	
	:	
MHR CAPITAL PARTNERS, L.P.,	:	
MHR INSTITUTIONAL PARTNERS, L.P.,	:	
MHRM, L.P., and MHR FUND MANAGEMENT LLC,	:	
	:	
Defendants.	:	
MHR CAPITAL PARTNERS, L.P.,	X	
MHR INSTITUTIONAL PARTNERS, L.P.,	:	
and MHRM, L.P.,	:	Case No. 1:05-CV-00115-KAJ
	:	
Third-Party Plaintiffs,	:	
	:	
v.	:	
	:	
N.E.S. INVESTMENT COMPANY, <i>et al.</i> ,	:	
	:	
Third-Party Defendants.	:	
	X	

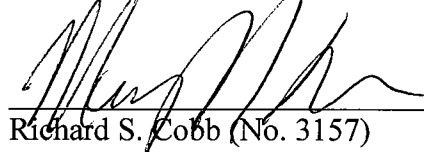
REQUEST FOR ORAL ARGUMENT

Pursuant to D. Del. LR. 7.1.4, MHR Capital Partners LP, MHR Institutional Partners LP, MHRM LP and MHR Fund Management LLC (collectively, “MHR”) hereby notify the Court that briefing is complete on their Motion to Dismiss, or in the Alternative for Summary

Judgment, on Counts II and III of the Amended Complaint (the "Motion"). MHR respectfully requests oral argument on the Motion at the Court's convenience.

Dated: October 4, 2005

LANDIS RATH & COBB LLP

A handwritten signature in black ink, appearing to read "Richard S. Cobb", is written over a horizontal line.

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-and-

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MHR Institutional Partners LP, MHRM LP and
MHR Fund Management LLC